

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In re:)
)
Application of American Safety Movers,)
Inc. for Class E Certificate of Public)
Convenience and Necessity to transport)
Household Goods Between Points and)
Places in South Carolina restricted to the)
Transportation of U.S. Department of)
Defense Shipments for Department of)
Defense Personnel)

**MOTION FOR PROTECTIVE TREATMENT AND
BASIS FOR FILING EXHIBIT AS TRADE SECRET**

American Safety Movers, Inc. ("American Safety" or "Applicant"), by its undersigned counsel and pursuant to S.C. Code Ann. § 39-8-10, et seq., Commission Order No. 2005-226, and all other applicable rules, statutes and regulations, hereby files this Motion for Protective Treatment ("Motion") in the above-captioned proceeding. By this Motion, the Applicant seeks protective treatment by the Public Service Commission of South Carolina ("Commission"), of certain commercially-sensitive financial statements filed as Trade Secret and attached to the Application of American Safety for a Class E Certificate of Public Convenience and Necessity to transport Household Goods Between Points and Places in South Carolina restricted to the Transportation of U.S. Department of Defense Shipments for Department of Defense Personnel ("Application"). Because this Motion is an inseparable part of the Application, it is being filed concurrently therewith.

In support of this Motion, the Applicant provides the following:

1. The exact legal name, address and telephone number of the Applicant are:

American Safety Movers, Inc.
216 Druid Street
Jacksonville, Florida 32254
Telephone: (904) 353-4848
Facsimile: (904) 353-4448

2. Correspondence or communications regarding this Motion should be addressed to:

Bonnie D. Shealy
1901 Main Street, Suite 1200
Post Office Box 944
Columbia, South Carolina 29202
Telephone: 803.227.1102
Facsimile: 803.252-0724
bshealy@robinsonlaw.com

with a copy to:

Patrick B. Coleman, Vice President
American Safety Movers, Inc.
216 Druid Street
Jacksonville, FL 32254
Telephone: (904) 353-4848
Email: pbc@amsamovers.net

I. Description of Confidential Information.

3. The Application requires American Safety to disclose evidence of financial fitness through the submission of documentation of its financial resources and ability to provide the requested service. In conformity with this requirement, the Applicant submits its audited financial statement. These documents contain highly confidential and strictly proprietary information, the public disclosure of which may result in direct, immediate and substantial harm to the competitive position of American Safety Movers, Inc. and the Application in South Carolina and elsewhere.

II. Grounds for Claim of Confidentiality.

4. Applicant is presently not legally required to prepare or submit financial statements, or any other financial information, to any public entity. As such, the financial statements attached to the Application are not readily available to persons external to Applicant except for regulatory and governmental agencies with jurisdiction over Applicant, and then only under seal.

5. Because the financial statements submitted by Applicant in support of the Application contain confidential and commercially-sensitive information from which its competitors may derive economic value, Applicant seeks to protect such material from public disclosure. Applicant derives independent economic value from the fact that significant, detailed and proprietary information regarding its financial structure and current financing activities is unknown to its competitors. As such, the financial statements are a “trade secret” as that term is used in South Carolina Trade Secrets Act. S.C. Code Section 39-8-20(5). Given this fact, the disclosure of this information could provide existing and potential competitors in South Carolina, as well as in other states in which Applicant provides or intends to provide transportation services, with an unfair and undeserved competitive advantage.

6. Applicant clarifies herein that its request for protection applies only to the documents attached as financial statements attached to the Application. Applicant is not seeking protection of any type for those reports Applicant is required to file with the Office of Regulatory Staff (“ORS”) should the relief sought in the Application be granted.

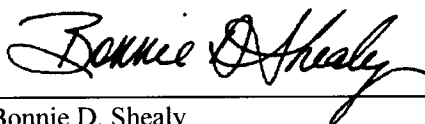
CONCLUSION

7. The financial information included in support of American Safety's Application, for which Confidential Treatment is sought, is both proprietary and competitively sensitive. The substantial and direct harm that could be caused to Applicant as a result of disclosure is real and not speculative. Moreover, to date, no other jurisdiction or governmental agency has required Applicant to make this information available to the public. For all these reasons, the financial statements attached to the Application should be protected from public disclosure the Commission.

WHEREFORE, American Safety Movers, Inc. respectfully requests that the South Carolina Public Service Commission grant this Motion for Protective Treatment with respect to the financial statements attached to the Application of American Safety Movers, Inc. for Class E Certificate of Public Convenience and Necessity to Transport Household Goods Between Points and Places in South Carolina restricted to Transportation of U.S. Department of Defense Shipments for Department of Defense Personnel throughout the State of South Carolina and filed under seal as Confidential in this proceeding.

Dated this 23rd day of May, 2014

Robinson, McFadden & Moore, P.C.



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